

Fill in this information to identify the case:

United States Bankruptcy Court for the:

Northern District of Texas

Case number (if known): Chapter 11

☐ Check if this is an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

06/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name

Metroplex Recovery, LLC

2. All other names debtor used in the last 8 years

Metroplex Recovery

DFW Towing & Recovery

Include any assumed names, trade names, and *doing business as names*

Metroplex Locksmith

3. Debtor's federal Employer Identification Number (EIN)

90-0789268

4. Debtor's address

Principal place of business

Mailing address, if different from principal place of business

2003 W. Arkansas Lane

Number Street

Pantego, TX 76013

City State ZIP Code

Tarrant

County

Number Street

City State ZIP Code

Location of principal assets, if different from principal place of business

Number Street

City State ZIP Code

5. Debtor's website (URL)

<https://metroplexlocksmith.com/>

6. Type of debtor

☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))

☐ Partnership (excluding LLP)

☐ Other. Specify:

Debtor <u>Metroplex Recovery, LLC</u> Name _____	Case number (if known) _____
<div style="display: flex; justify-content: space-between;"> <div style="width: 25%;"> 7. Describe debtor's business </div> <div style="width: 75%;"> <p>A. Check one:</p> <div style="margin-bottom: 5px;"><input type="checkbox"/> Health Care Business (as defined in 11 U.S.C. § 101(27A))</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Railroad (as defined in 11 U.S.C. § 101(44))</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Stockbroker (as defined in 11 U.S.C. § 101(53A))</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Commodity Broker (as defined in 11 U.S.C. § 101(6))</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Clearing Bank (as defined in 11 U.S.C. § 781(3))</div> <div style="margin-bottom: 5px;"><input checked="" type="checkbox"/> None of the above</div> </div> </div> <hr/> <div style="display: flex; justify-content: space-between;"> <div style="width: 25%;"> 8. Under which chapter of the Bankruptcy Code is the debtor filing? </div> <div style="width: 75%;"> <p>B. Check all that apply:</p> <div style="margin-bottom: 5px;"><input type="checkbox"/> Tax-exempt entity (as described in 26 U.S.C. § 501)</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))</div> </div> </div> <hr/> <div style="display: flex; justify-content: space-between;"> <div style="width: 25%;"> <p>A debtor who is a "small business debtor" must check the first subbox. A debtor as defined in § 1182(1) who elects to proceed under subchapter V of chapter 11 (whether or not the debtor is a "small business debtor") must check the second sub-box</p> </div> <div style="width: 75%;"> <p>C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See http://www.uscourts.gov/four-digit-national-association-naics-codes .</p> <p style="text-align: center;"><u>5</u> <u>6</u> <u>1</u> <u>6</u></p> </div> </div>	
<div style="display: flex; justify-content: space-between;"> <div style="width: 25%;"> 9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years? </div> <div style="width: 75%;"> <p>Check one:</p> <div style="margin-bottom: 5px;"><input type="checkbox"/> Chapter 7</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Chapter 9</div> <div style="margin-bottom: 5px;"><input checked="" type="checkbox"/> Chapter 11. Check all that apply:</div> <div style="margin-bottom: 5px;"><input checked="" type="checkbox"/> The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).</div> <div style="margin-bottom: 5px;"><input checked="" type="checkbox"/> The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, and it chooses to proceed under Subchapter V of Chapter 11. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> A plan is being filed with this petition.</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the <i>Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11</i> (Official Form 201A) with this form.</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Chapter 12</div> </div> </div>	
<div style="display: flex; justify-content: space-between;"> <div style="width: 25%;"> 10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor? </div> <div style="width: 75%;"> <p>Check one:</p> <div style="margin-bottom: 5px;"><input checked="" type="checkbox"/> No</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Yes. Debtor _____ Relationship _____</div> <div style="margin-bottom: 5px;">District _____ When _____ Case number _____</div> <div style="margin-bottom: 5px;">Case number, if known _____</div> </div> </div>	

Debtor Metroplex Recovery, LLC Case number (if known) _____
Name

11. Why is the case filed in this district?

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

☒ No

☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? (Check all that apply.)

☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.
What is the hazard?

☐ It needs to be physically secured or protected from the weather.

☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).

☐ Other _____

Where is the property? _____

Number Street

City

State

ZIP Code

Is the property insured?

☐ No

☐ Yes. Insurance agency _____
Contact name _____
Phone _____

Statistical and administrative information

13. Debtor's estimation of available funds?

Check one:

- ☐ Funds will be available for distribution to unsecured creditors.
- ☒ After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

14. Estimated number of creditors

- ☒ 1-49 ☐ 50-99 ☐ 1,000-5,000 ☐ 5,001-10,000 ☐ 25,001-50,000 ☐ 50,000-100,000
- ☐ 100-199 ☐ 200-999 ☐ 10,001-25,000 ☐ More than 100,000

15. Estimated assets

- ☐ \$0-\$50,000 ☐ \$1,000,001-\$10 million ☐ \$500,000,001-\$1 billion
- ☐ \$50,001-\$100,000 ☐ \$10,000,001-\$50 million ☐ \$1,000,000,001-\$10 billion
- ☐ \$100,001-\$500,000 ☐ \$50,000,001-\$100 million ☐ \$10,000,000,001-\$50 billion
- ☒ \$500,001-\$1 million ☐ \$100,000,001-\$500 million ☐ More than \$50 billion

Debtor Metroplex Recovery, LLC Case number (if known) _____
Name

16. Estimated liabilities

- | | | |
|--|--|--|
| <input type="checkbox"/> \$0-\$50,000 | <input checked="" type="checkbox"/> \$1,000,001-\$10 million | <input type="checkbox"/> \$500,000,001-\$1 billion |
| <input type="checkbox"/> \$50,001-\$100,000 | <input type="checkbox"/> \$10,000,001-\$50 million | <input type="checkbox"/> \$1,000,000,001-\$10 billion |
| <input type="checkbox"/> \$100,001-\$500,000 | <input type="checkbox"/> \$50,000,001-\$100 million | <input type="checkbox"/> \$10,000,000,001-\$50 billion |
| <input type="checkbox"/> \$500,001-\$1 million | <input type="checkbox"/> \$100,000,001-\$500 million | <input type="checkbox"/> More than \$50 billion |

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

17. Declaration and signature of authorized representative of debtor

- The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.
- I have been authorized to file this petition on behalf of the debtor.
- I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 09/01/2023
MM/ DD/ YYYY

X

/s/ Adrian Torres

Signature of authorized representative of debtor

Adrian Torres

Printed name

Title Managing Member

18. Signature of attorney

X

/s/ Jim Morrison

Signature of attorney for debtor

Date 09/01/2023

MM/ DD/ YYYY

Jim Morrison

Printed name

Lee Law Firm, PLLC

Firm name

8701 Bedford Euleess Rd 510

Number Street

Hurst

City

TX

State

76053

ZIP Code

(469) 646-8995

Contact phone

jmorrisson@leelawtx.com

Email address

14519050

Bar number

TX

State

United States Bankruptcy Court
Northern District of Texas

In re Metroplex Recovery, LLC

Debtor(s)

Case No. _____

Chapter _____

11

CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for Metroplex Recovery, LLC in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

☒ None [Check if applicable]

09/01/2023

Date

/s/ Jim Morrison

Jim Morrison

Signature of Attorney or Litigant

Counsel for Metroplex Recovery, LLC

Bar Number: 14519050

Lee Law Firm, PLLC

8701 Bedford Euless Rd 510

Hurst, TX 76053

Phone: (214) 440-1414

Email: jmorrison@leelawtx.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re METROPLEX RECOVERY, LLC Case No. _____
Debtor Chapter 11

STATEMENT REGARDING AUTHORITY TO SIGN AND FILE PETITION

I, Adrian Torres, declare under penalty of perjury that I am the Managing Member of METROPLEX RECOVERY, LLC, and that the following is a true and correct copy of the resolutions adopted by said Limited Liability Company (LLC) at a special meeting duly called and held on the 1st day of September, 2023.

"WHEREAS, it is in the best interest of this Limited Liability Company (LLC) to file a voluntary petition in the United States Bankruptcy Court pursuant to Chapter 11 of Title 11 of the United States Code;

BE IT, THEREFORE, RESOLVED that Adrian Torres, Managing Member of this Limited Liability Company (LLC), is authorized and directed to execute and deliver all documents necessary to perfect the filing of a chapter 11 voluntary bankruptcy case on behalf of the Limited Liability Company (LLC); and

BE IT FURTHER RESOLVED that Adrian Torres, Managing Member of this Limited Liability Company (LLC) is authorized and directed to appear in all bankruptcy proceedings on behalf of the Limited Liability Company (LLC), and to otherwise do and perform all acts and deeds and to execute and deliver all necessary documents on behalf of the Limited Liability Company (LLC) in connection with such bankruptcy case, and

BE IT FURTHER RESOLVED that Adrian Torres, Managing Member of this Limited Liability Company (LLC) is authorized and directed to employ Christopher M. Lee, attorney and the law firm of Lee Law Firm, PLLC to represent the Limited Liability Company (LLC) in such bankruptcy case."

Date: September 1, 2023 Signed: /s/ Adrian Torres
Adrian Torres

Fill in this information to identify the case:

Debtor name Metroplex Recovery, LLC

United States Bankruptcy Court for the:

Northern District of Texas

Case number (if known): _____

☐ Check if this is an amended filing

Official Form 204

Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an *insider*, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	CIT First Citizens Bank P.O. Box 856502 Minneapolis, MN 55485		Equipment Loan				\$160,000.00
2	CIT First Citizens Bank P.O. Box 856502 Minneapolis, MN 55485		Equipment Loan				\$74,602.00
3	Exxon Mobile P.O. Box 6293 Carol Stream, IL 60197						\$8,669.00
4	Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7340						\$5,468.00
5	Legend Advance Funding II LLC 10 W 37th St Rm 602 800 Brickell Ave 902 Miami, FL 33131						\$127,028.00
6	Mercedes Benz Financial 5450 N Cumberland Ave Chicago, IL 60656			Contingent	\$59,707.00	\$28,597.00	\$31,110.00
7	Mercedes Benz Financial 5450 N Cumberland Ave Chicago, IL 60656			Contingent	\$59,707.00	\$30,745.00	\$28,962.00
8	Mercedes Benz Financial 5450 N Cumberland Ave Chicago, IL 60656			Contingent	\$37,364.00	\$24,884.00	\$12,480.00

Debtor Metroplex Recovery, LLC
Name

Case number (if known) _____

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
9	Mercedes Benz Financial 5450 N Cumberland Ave Chicago, IL 60656			Contingent	\$37,547.00	\$29,000.00	\$8,547.00
10	Mercedes Benz Financial 5450 N Cumberland Ave Chicago, IL 60656			Contingent	\$35,640.00	\$29,545.00	\$6,095.00
11	Mercedes Benz Financial 5450 N Cumberland Ave Chicago, IL 60656			Contingent	\$27,810.00	\$24,377.00	\$3,433.00
12	Mercedes Benz Financial 5450 N Cumberland Ave Chicago, IL 60656			Contingent	\$27,727.00	\$25,000.00	\$2,727.00
13	National Funding 9530 Towne Centre Dr San Diego, CA 92121		MCA				\$111,470.00
14	Peac Solutions P.O. Box 13604 Philadelphia, PA 19101		Software purchase				\$127,640.00
15	Sun Valley Industrial Park, LP 4900 Sun Valley Drive Fort Worth, TX 76102						\$103,165.00
16	US Department of the Treasury PO Box 830794 Birmingham, AL 35283-0794						\$27,020.00
17	US Department of the Treasury PO Box 830794 Birmingham, AL 35283-0794						\$13,367.00
18	US Dept of Treasury SBA P.O. Box 97901 Saint Louis, MO 63197						\$1,836,900.00
19	Wide Merchant Capital 300 Delaware Ave 210 Wilmington, DE 19801						\$68,393.00
20							

B2030 (Form 2030) (12/15)

United States Bankruptcy Court
Northern District of Texas

In re Metroplex Recovery, LLC

Case No. _____

Debtor

Chapter 11

DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR

1. Pursuant to 11 U.S.C. § 329(a) and Fed. Bankr. P. 2016(b), I certify that I am the attorney for the above named debtor(s) and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

For legal services, I have agreed to accept \$11,262.00

Prior to the filing of this statement I have received \$11,262.00

Balance Due \$0.00

2. The source of the compensation paid to me was:

☒ Debtor ☐ Other (specify)

3. The source of compensation to be paid to me is:

☒ Debtor ☐ Other (specify)

4. ☒ I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.

☐ I have agreed to share the above-disclosed compensation with a other person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation, is attached.

5. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:

- a. Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
- b. Preparation and filing of any petition, schedules, statements of affairs and plan which may be required;
- c. Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;

6. By agreement with the debtor(s), the above-disclosed fee does not include the following services:

B2030 (Form 2030) (12/15)

CERTIFICATION

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

09/01/2023
Date

/s/ Jim Morrison
Jim Morrison
Signature of Attorney

Bar Number: 14519050
Lee Law Firm, PLLC
8701 Bedford Euless Rd 510
Hurst, TX 76053
Phone: (214) 440-1414

Lee Law Firm, PLLC
Name of law firm

Date: 09/01/2023

/s/ Adrian Torres
Adrian Torres

Jim Morrison
State Bar No. 14519050
Christopher M. Lee
State Bar No. 24041319
Eric A. Maskell
State Bar No. 24041409
ECF@LeeLawTX.com
LEE LAW FIRM, PLLC
8701 Bedford Eules Rd, Ste 510
Hurst, TX 76053
Telephone: 469-646-8995
Facsimile: 469-694-1059
PROPOSED ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	
	§	CASE NO.
METROPLEX RECOVERY, LLC	§	
	§	Chapter 11
Debtor.	§	

DEBTOR'S BALANCE SHEET

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The Debtor's most recent Balance Sheet is attached hereto.

Dated: September 7, 2023

Respectfully submitted,

/s/ Jim Morrison

Jim Morrison
State Bar No. 14519050
Christopher M. Lee
State Bar No. 24041319
Eric A. Maskell
State Bar No. 24041409
ECF@LeeLawTX.com
LEE LAW FIRM, PLLC
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Hurst, TX 76053
Telephone: 469-646-8995
Facsimile: 469-694-1059
PROPOSED ATTORNEY FOR DEBTOR

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Metroplex Locksmith

Balance Sheet

As of August 28, 2023

	TOTAL
ASSETS	
Current Assets	
Bank Accounts	
CHASE 7977	-45,852.39
Chase Business Account 3730	0.00
Chase Business Account 8137	-5,333.57
Chase Savings 4604	250,657.64
Checking chase 6275	0.00
QuickBooks Checking Account	3,110.74
Total Bank Accounts	\$202,582.42
Accounts Receivable	
Accounts Receivable	0.00
Total Accounts Receivable	\$0.00
Other Current Assets	
Inventory Asset	-543.97
Payroll Refunds	-100,722.66
Uncategorized Asset	-126.19
Undeposited Funds	0.00
Total Other Current Assets	\$ -101,392.82
Total Current Assets	\$101,189.60
Fixed Assets	
Autos & Trucks	
2019 Ford f350 KEF77041	85,400.37
2019 Ford Transit Connect K1392366	28,248.72
2019 Ford Transit Connect K1397395	28,935.64
2020 Ford Transit Connect L1455014	31,734.22
2021 Mercedes Benz Metris M3856801 M3861234	86,734.81
2021 Mercedes-Benz Metris M381652	39,293.73
2021 Mercedes-Benz Metris M3846204	41,675.88
2021 Mercedes-Benz Metris M3855402	43,170.11
2021 Mercedes-Benz Sprinter PG07396793	47,773.51
2022 Mercedes Benz AMG GLE 53C NA742977	96,884.10
2022 Mercedes-Benz Metris N3963740	43,414.77
2022 Mercedes-Benz Metris N3967701	51,231.80
2022 Mercedes-Benz Metris N4118053	53,646.20
2022 Mercedes-Benz Sprinter	56,038.07
Total Autos & Trucks	734,181.93
Total Fixed Assets	\$734,181.93

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Metroplex Locksmith

Balance Sheet
As of August 28, 2023

	TOTAL
Other Assets	
Security Deposit	8,162.33
Total Other Assets	\$8,162.33
TOTAL ASSETS	\$843,533.86
LIABILITIES AND EQUITY	
Liabilities	
Current Liabilities	
Credit Cards	
Citi 1483	4,161.02
Citi 1664	691.20
Citi 2841	2,739.63
Citi 2994	15,767.31
Citi 3036	0.00
Credit Card BOA 5727	0.00
Credit Card Capital One - 6686/9358	1,591.84
Credit Card Citi 5526	-33,821.55
Credit Card Dell	-902.17
Discover Credit Card 6569	14,438.17
Total Credit Cards	\$4,665.45
Other Current Liabilities	
Direct Deposit Payable	2,305.84
Payroll Liabilities	-106.40
Child Support Withholding	179.57
Federal Taxes (941/944)	30,930.76
Federal Unemployment (940)	1,097.26
TX Unemployment Tax	-3,910.32
Total Payroll Liabilities	28,190.87
Sales Tax Agency Payable	-8,032.74
Sales tax payable	0.00
Unearned Revenue	0.00
Total Other Current Liabilities	\$22,463.97
Total Current Liabilities	\$27,129.42

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Metroplex Locksmith

Balance Sheet

As of August 28, 2023

	TOTAL
Long-Term Liabilities	
Auto Loan	0.00
2019 Ford f350 KEF77041 \$1561.65	20,400.55
2019 Ford Transit Connect K1392366 \$593.19	14,677.65
2019 Ford Transit Connect K1397395 \$607.61	15,034.74
2020 Ford Transit Connect L1455014 \$578.81	19,200.39
2021 Mercedes Benz Metris M3856801 M3861234 \$1556.48	51,373.94
2021 Mercedes-Benz Metris M381652 \$705.14	26,403.41
2021 Mercedes-Benz Metris M3846204 \$799.64	36,878.04
2021 Mercedes-Benz Metris M3855402 \$774.70	28,233.00
2021 Mercedes-Benz Sprinter MT044235 \$917.77	39,805.09
2022 Mercedes-Benz Metris N3963740 \$778.74	33,742.33
2022 Mercedes-Benz Metris N3967701 \$770.53	40,109.45
2022 Mercedes-Benz Metris N4118053 \$810.77	37,924.03
2022 Mercedes-Benz Sprinter \$868.45	37,958.92
Mercedes Benz AMG GLE 53C NA742977 \$1625.52	24,256.44
Total Auto Loan	425,997.98
Loan Affirm Generator	0.00
Loan Direct Capital	-17,084.40
Loan Direct Capital 3	-3,433.29
Loan Direct Capital 30k monthly \$780.22	36.21
Loan Legend Advance Funding	-800.00
Loan Marlin Buisness Capital 553.48	-5,488.56
Loan Marlin Buisness Capital \$2769.23	-7,995.47
Loan National Funding Loan	48,855.84
Loan Payable	0.00
Loan PPP	36,057.00
Loan PPP 2	91,107.00
Loan SBA	1,836,900.00
Loan Wide Merchant	-5,353.35
Total Long-Term Liabilities	\$2,398,798.96
Total Liabilities	\$2,425,928.38
Equity	
Drawings by Owner	-455,284.74
Opening Balance Equity	-768,153.43
Owner's Equity	-28,497.86
Owner's Equity - Contribution	363,348.48
Retained Earnings	-566,664.54
Temp/Perm Tax Difference	3,894.51
Net Income	-131,036.94
Total Equity	\$ -1,582,394.52
TOTAL LIABILITIES AND EQUITY	\$843,533.86

Jim Morrison
State Bar No. 14519050
Christopher M. Lee
State Bar No. 24041319
Eric A. Maskell
State Bar No. 24041409
ECF@LeeLawTX.com
LEE LAW FIRM, PLLC
8701 Bedford Euless Rd, Ste 510
Hurst, TX 76053
Telephone: 469-646-8995
Facsimile: 469-694-1059
PROPOSED ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	
	§	CASE NO.
METROPLEX RECOVERY, LLC	§	
	§	Chapter 11
Debtor.	§	

DEBTOR'S STATEMENT OF OPERATIONS

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The Debtor's most recent Statement of Operations is attached hereto.

Dated: September 7, 2023

Respectfully submitted,

/s/ Jim Morrison

Jim Morrison
State Bar No. 14519050
Christopher M. Lee
State Bar No. 24041319
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PROPOSED ATTORNEY FOR DEBTOR

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Metroplex Locksmith

Profit and Loss

July 1, 2022 - July 1, 2023

	TOTAL
Income	
1 - Locksmith Services	3,800.00
Refunds-Allowances	-55.00
Sales of Product Income	1,577,575.90
Total Income	\$1,581,320.90
Cost of Goods Sold	
Cost of Goods Sold	45,828.93
Discount Key Codes	1,676.00
Equipment & Supplies	7,841.35
Instacode	1,226.36
Key codes Chrysler	870.65
Key codes Ford	675.22
Key codes GM	3,003.50
Key codes Honda	375.00
Key codes Hyundai	816.14
Key codes Mitsubishi	1,163.74
Key codes Volkswagen	10,703.20
Key Costs	254,220.46
Kia key codes	503.70
Toyota Key Codes	1,324.51
Volvo key codes subscriptions	7,478.48
Total Cost of Goods Sold	337,707.24
Non-Deductible Expense	
Auto Expense	170.31
Fuel - Vehicle(s)	61,592.69
Insurance - Vehicle(s)	27,891.60
Repair/Maintenance/Registration - Vehicle(s)	16,823.77
Total Non-Deductible Expense	106,478.37
Total Cost of Goods Sold	\$444,185.61
GROSS PROFIT	\$1,137,135.29
Expenses	
Exempt Wages - Contractor Feesor	205,072.53
Fuel - Vehicle(s)	144.37
Overhead	
Advertising	355,255.36
Bank Charges	2,603.65
Late Fee/ Service Fee/Insurance Charge	4,183.95
Total Bank Charges	6,787.60

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Metroplex Locksmith

Profit and Loss

July 1, 2022 - July 1, 2023

	TOTAL
Computer Expense	1,159.21
Software Expense	46,655.11
GPS Monitoring Software	2,942.60
Total Software Expense	49,597.71
Total Computer Expense	50,756.92
Dues & Subscriptions	278.67
Equipment Rental	923.77
Legal & Professional Fees	35,957.99
Meals and Entertainment 50%	548.35
Meals & Entertainment 100%	26,173.20
Total Meals and Entertainment 50%	26,721.55
Merchant Processing	-0.31
Monitoring System	41,779.46
Office Expense & Supplies	37,427.09
Employees schedule software (WHEN I WORK)	413.53
Office schedule software (TIMELY)	2,702.65
Total Office Expense & Supplies	40,543.27
Other Miscellaneous Service Cost	1,600.00
Postage and Delivery	13,512.63
Promotional	138.66
Purchases	750.00
Rent or Lease	99,141.28
Repair & Maintenance	43,194.50
Taxes & Licenses	1,937.66
Telephone	9,689.49
Internet and TV Service	29,780.66
Total Telephone	39,470.15
Towing & Transport Services	2,209.70
Transportation Fees	1,350.00
Travel Expenses	16,475.00
Lodging	32,160.81
Toll & Parking	12,552.24
Transportation	691.26
Travel Meals	784.87
Total Travel Expenses	62,664.18
Uniforms	1,223.63
Utilities	9,625.40
Total Overhead	835,822.07

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Metroplex Locksmith

Profit and Loss

July 1, 2022 - July 1, 2023

	TOTAL
Payroll Expenses	77,885.23
Exempt Wages - Contractor Fees	107,897.79
Guaranteed Payments	850.00
Non-Exempt Wages	671.00
Field Technicians	946.76
Management	75,157.20
Total Non-Exempt Wages	76,774.96
Payroll Taxes	
Federal Taxes SSN & Medicare (941/944)	4,558.27
Total Payroll Taxes	4,558.27
Taxes	7,686.11
Federal Taxes (941/944)	80,706.76
Federal Unemployment (940)	850.33
TX Unemployment Tax	545.32
Total Taxes	89,788.52
Wages	635,311.95
workers compensation fees	705.65
Total Payroll Expenses	993,772.37
QuickBooks Payments Fees	110.45
Uncategorized Expense	126,893.18
Utilities	540.17
Total Expenses	\$2,162,355.14
NET OPERATING INCOME	\$ -1,025,219.85
Other Income	
Cash Back Reward Credit Card	-82.26
Other Income	9.56
Total Other Income	\$ -72.70
Other Expenses	
Auto Expense	1,812.47
Total Other Expenses	\$1,812.47
NET OTHER INCOME	\$ -1,885.17
NET INCOME	\$ -1,027,105.02

Jim Morrison
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PROPOSED ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	
	§	CASE NO.
METROPLEX RECOVERY, LLC	§	
	§	Chapter 11
Debtor.	§	

DEBTOR'S CASH FLOW STATEMENT

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The Debtor's most recent Cash Flow Statement is attached hereto.

Dated: September 7, 2023

Respectfully submitted,

/s/ Jim Morrison

Jim Morrison
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PROPOSED ATTORNEY FOR DEBTOR

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Metroplex Locksmith

Profit and Loss

January 1 - July 1, 2023

	TOTAL
Income	
1 - Locksmith Services	3,800.00
Refunds-Allowances	-55.00
Sales of Product Income	537,828.53
Total Income	\$541,573.53
Cost of Goods Sold	
Cost of Goods Sold	42,464.27
Discount Key Codes	635.00
Equipment & Supplies	1,128.86
Instacode	453.22
Key codes Chrysler	109.95
Key codes Ford	271.64
Key codes GM	966.35
Key codes Honda	75.00
Key codes Mitsubishi	624.19
Key codes Volkswagen	1,881.44
Key Costs	109,313.21
Kia key codes	98.00
Toyota Key Codes	205.69
Volvo key codes subscriptions	2,376.24
Total Cost of Goods Sold	160,603.06
Non-Deductible Expense	
Auto Expense	96.31
Fuel - Vehicle(s)	19,045.67
Insurance - Vehicle(s)	10,442.59
Repair/Maintenance/Registration - Vehicle(s)	3,693.36
Total Non-Deductible Expense	33,277.93
Total Cost of Goods Sold	\$193,880.99
GROSS PROFIT	\$347,692.54
Expenses	
Exempt Wages - Contractor Feesor	114,529.72
Fuel - Vehicle(s)	144.37
Overhead	
Advertising	111,176.85
Bank Charges	2,527.48
Late Fee/ Service Fee/Insurance Charge	2,945.71
Total Bank Charges	5,473.19
Computer Expense	1,159.21
Software Expense	31,377.44
Total Computer Expense	32,536.65

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Metroplex Locksmith

Profit and Loss

January 1 - July 1, 2023

	TOTAL
Dues & Subscriptions	104.03
Equipment Rental	10.69
Legal & Professional Fees	14,095.70
Meals and Entertainment 50%	504.09
Meals & Entertainment 100%	6,728.39
Total Meals and Entertainment 50%	7,232.48
Monitoring System	8,255.00
Office Expense & Supplies	7,406.36
Employees schedule software (WHEN I WORK)	108.25
Office schedule software (TIMELY)	858.76
Total Office Expense & Supplies	8,373.37
Postage and Delivery	5,272.99
Purchases	750.00
Rent or Lease	33,443.96
Repair & Maintenance	3,447.85
Taxes & Licenses	709.00
Telephone	6,560.31
Internet and TV Service	9,289.26
Total Telephone	15,849.57
Towing & Transport Services	1,076.00
Travel Expenses	5,275.96
Lodging	692.14
Toll & Parking	3,304.01
Transportation	554.91
Travel Meals	612.07
Total Travel Expenses	10,439.09
Utilities	4,446.51
Total Overhead	262,692.93
Payroll Expenses	77,885.23
Exempt Wages - Contractor Fees	41,658.13
Non-Exempt Wages	671.00
Field Technicians	723.64
Total Non-Exempt Wages	1,394.64
Taxes	7,686.11
Federal Taxes (941/944)	15,110.73
Federal Unemployment (940)	498.53
TX Unemployment Tax	313.93
Total Taxes	23,609.30
Wages	197,525.85
Total Payroll Expenses	342,073.15

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Metroplex Locksmith**Profit and Loss**

January 1 - July 1, 2023

	TOTAL
QuickBooks Payments Fees	110.45
Uncategorized Expense	29,767.09
Utilities	540.17
Total Expenses	\$749,857.88
NET OPERATING INCOME	\$ -402,165.34
Other Income	
Cash Back Reward Credit Card	-82.26
Other Income	9.56
Total Other Income	\$ -72.70
NET OTHER INCOME	\$ -72.70
NET INCOME	\$ -402,238.04

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE: **Metroplex Recovery, LLC**

CASE NO

CHAPTER 11

VERIFICATION OF CREDITOR MATRIX

The above named Debtor hereby verifies that the attached list of creditors is true and correct to the best of his/her knowledge.

Date 09/01/2023

Signature /s/ Adrian Torres
Adrian Torres, Managing Member

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